

## Ted Droettboom - Comments on proposed MTC TOD Policy by SPUR State and Regional Committee

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**To:** <jrubin@pencoalition.com>, "Scott Hagerty" <district1@co.alameda.ca.us>  
**Date:** 3/23/2005 9:26 PM  
**Subject:** Comments on proposed MTC TOD Policy by SPUR State and Regional Committee  
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Honorable Jon Rubin, Chair  
 Metropolitan Transportation Commission (MTC)

Honorable Scott Hagerty, Chair  
 MTC/ABAG/BAAQMD Joint Policy Committee (JPC)

Joseph P. Bort MetroCenter  
 101 Eighth Street  
 Oakland, CA 94607

Dear Chairs Rubin and Hagerty,

The State and Regional Affairs Committee of the San Francisco Planning and Urban Research Association (SPUR) offers these comments on the MTC's proposed policy in support of transit oriented development (TOD) for projects under Resolution 3434.

SPUR's committee supports this policy as clear a step toward better forms of growth in the Bay Area. We particularly admire its provisions for consultative mechanisms with cities, flexibility within corridors, and planning support for cooperating localities. We also support the Livable Communities Platform (LCP) which has been put forward by Greenbelt Alliance, TALC, and others. Particularly valuable are the LCP's call to plan for compact development so that at least half the new housing built in the Bay Area is located in station areas, and to distinguish housing and commercial development in the regulations in order to stress the region's need for housing, and for housing on transit. However, while there should be the normal inclusionary provisions with regard to affordability, we believe that TOD housing should be aimed at the entire population, since large-scale transit oriented housing is needed by the Bay Area community as a whole. Designing TOD for the full spectrum of society will also help TOD's acceptability to the local governments whose cooperation is essential.

We hope that the new TOD policy will be strongly supported by the Joint Policy Committee and will be enacted by MTC in the Spring. Visitors to our region are astonished that we have no policy instruments at all to generate housing and mixed uses around transit stations. If we can at last remedy that gap, we clearly will have struck a blow for common sense.

However, all concerned should be aware of the TOD policy's pronounced limitations when

measured against the very large need for TOD in the Bay Area. This policy will apply to a limited number of corridor plans, some of which will likely never be constructed. Given the size and complexity of a major transportation investment, it is questionable whether such a transportation project can in practice be withheld because a particular locality is reluctant to make TOD commitments.

Therefore, MTC and the JPC should now intensify work on other pro-TOD policies in the public sector, designed to bring forth major TOD investments from the private sector. We see the best opportunity for large volume, high density TOD in the Bay Area in the numerous existing rail stops and stations (BART and Caltrain, VTA and Muni Metro) rather than on unbuilt lines. We also suggest that the greatest effects in starting the cities' and the private sector's engines will come from incentives organized by the MTC/JPC using State money administered decisively and resolutely at the regional level to modernize the land use practices of localities.

Working with carrots rather than sticks should not mean a dilution of regional policy goals or lowering the density of TOD. Since the Bay Area expects large population growth to continue into the indefinite future, and should aim to make TOD available for half or better of coming growth, each station-oriented center should be both dense and substantial in size. A reasonable target concept, subject, of course, to local variation, would be housing and services for 10,000 people with 5,000 job sites within walking distance of a rail station, an area on the order of 300 acres.

After approval of the present TOD policy for Res. 3434 locations, this is not the time for a let-up. We hope that the MTC and the JPC will give serious consideration to starting work on a regional plan that will show proposed TOD locations, based on site studies, which we understand have been commendably initiated by MTC staff. It could also be productive to work out and mobilize regional support for one or two major and genuine TOD projects in the near future in order to produce "examples on the ground." This is the best way to demonstrate to local officials, to the market, and to the population at large the merits of TOD, in light of the immense needs of the housing-scarce, congestion-choked Bay Area.

Sincerely yours,

Peter Lydon and Paul Sedway

Co-Chairs, SPUR State and Regional Affairs Committee

(Letterhead paper version of this letter follows.)